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MAR 29 2010

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

March 29, 2010

**VIA OVERNIGHT DELIVERY**

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
400 North Street  
Harrisburg, PA 17120

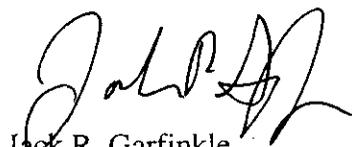
Re: Implementation of the Alternative Energy Portfolio Standards Act of 2004:  
Standards for the Participation of Demand Side Management Resources –  
Technical Reference Manual Update – Docket No. M-00051865

Dear Secretary McNulty:

Pursuant to the February 2, 2010 Tentative Order in the above-referenced docket, enclosed please find an original and fifteen (15) copies of PECO Energy Company's Reply Comments on the Commission's proposed update to its 2009 Technical Reference Manual. The Comments have also been electronically mailed to Gregory A. Shawley and Kriss Brown.

Kindly return a time-stamped copy of this letter in the self-addressed envelope that is enclosed. Please do not hesitate to contact me should you have any questions regarding this filing.

Very truly yours,



Jack R. Garfinkle  
Assistant General Counsel

Enclosures

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Implementation of the Alternative Energy** :  
**Portfolio Standards Act of 2004: Standards** :  
**for the Participation of Demand Side** : **Docket No. M-00051865**  
**Management Resources – Technical** :  
**Reference Manual Update** :

**REPLY COMMENTS OF PECO ENERGY COMPANY ON THE  
PROPOSED UPDATE TO THE TECHNICAL REFERENCE MANUAL**

Pursuant to the February 2, 2010 Tentative Order entered by the Pennsylvania Public Utility Commission (the “Commission”) in the above-referenced docket, PECO Energy Company (“PECO” or the “Company”) hereby submits reply comments on the Commission’s proposed update to its 2009 Technical Reference Manual (“TRM”).

**I. SPECIFIC REPLY COMMENTS**

**A. Dusk to Dawn Lighting**

In PECO’s comments to the proposed TRM update, the Company recommended that the TRM specifically address efficiency upgrades for dusk to dawn security and roadway lighting applications and include a new row in Table 6-6 for that lighting category. *See* PECO Comments, p. 4. PECO supports the related recommendation of Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”) and Pennsylvania Power Company (“Penn Power”) to use an Equivalent Full Load Hours value of 4300 in Table 6-6 for dusk to dawn lighting. *See* Met-Ed, Penelec, and Penn Power Comments, Attachment, p. 1.

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**B. Energy Star CFLs**

PECO supports the recommendation of Duquesne Light Company (“Duquesne”) to revise the coincidence factor (“CF”) for Energy Star CFLs in Table 4-3 of the proposed TRM update. *See* Duquesne Comments, pp. 2-4. In particular, PECO agrees that the existing 5% CF is too low and that it would be more appropriate to treat the three average hours of use per day as occurring during the peak period, resulting in a 37.5% CF.

**C. PJM Demand Response Protocols**

PECO supports the recommendation of Constellation NewEnergy, Inc. (“Constellation”) to allow all PJM Interconnection, LLC demand response protocols in the TRM as options for measurement and verification. This would include Guaranteed Load Drop options as well as the Economic methodology. *See* Constellation Comments, p. 2. These additional measurement protocols will increase the demand response opportunities for PECO’s diverse customer base.

**D. Fuel Switching**

PECO does not support the recommendation of UGI Distribution Companies (“UGI”) to include specific guidance regarding fuel switching programs in the TRM. *See* UGI Comments, pp. 4-5. As UGI acknowledges in its comments, the Commission has convened a Fuel Switching Working Group (“FSWG”) to identify, research and address issues related to the use of fuel switching programs. *Id.* at 3. The FSWG is to submit recommendations to the Commission by March 31, 2010. PECO believes that the FSWG is the appropriate venue to address UGI’s suggestions regarding fuel switching programs, and that it is appropriate to wait for the FSWG to conclude before addressing the issue in the TRM.

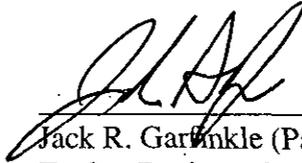
### **E. HVAC Diagnostics**

PECO does not support the recommendation of Field Diagnostic Services, Inc. (“FDSI”) to include a “bank grade process” for the collection and transmission of HVAC diagnostic data in the TRM. *See* FDSI Comments §1.3. This type of analysis is dependent upon the operating condition of the particular HVAC unit being diagnosed, and therefore would be considered a “custom” analysis. The Commission has convened a Technical Working Group (“TWG”), led by the Statewide Evaluator, to address issues related to custom analyses of energy savings. PECO believes that the TWG is the appropriate venue to address custom HVAC diagnostics and establish specific protocols for data collection.

## II. CONCLUSION

PECO appreciates the opportunity to comment on this important matter.

Respectfully Submitted,



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March 29, 2010

*For PECO Energy Company*

